

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	CRIMINAL ACTION
v.)	
)	NO. 04-10299-PBS
VALENTIN MARTINEZ,)	
MANUEL GERMOSEN,)	
BENITO GRULLON, and)	
RICARDO ESTRADA)	

JOINT MOTION TO CONTINUE APRIL 25, 2005 TRIAL DATE

The United States respectfully moves this Court to continue the trial currently set for April 25, 2005. In support, the government states as follows:

On April 12, 2005, following an *en camera* proceeding, the Court disqualified Attorney Steven Judge from representing MANUEL GERMOSEN due to a conflict of interest. The court also took under advisement Attorney Ronald Segal's joint representation of BENITO GRULLON and VALENTIN MARTINEZ. At the conclusion of this hearing, Attorney Segal indicated that he would be filing a motion to continue the trial date. Attorney Segal attempted to do so the following day, but did not file the motion electronically as required by the Court.

Furthermore, Attorney Elliot Weinstein for RICARDO ESTRADA has indicated that he would like a continuance of the April 25, 2005 trial date due to his representation in an ongoing murder case in state court.

The Court has scheduled a status hearing for May 2, 2005 at 12:00 p.m. to resolve the issue of a new trial date.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Neil J. Gallagher, Jr.
Neil J. Gallagher, Jr.
Assistant U.S. Attorney
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Date: April 21, 2005

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon counsel of record a copy of the foregoing document via the United States District Court's ECF filing system and/or via U.S. mail.

This 20th day of April 2005.

Neil J. Gallagher, Jr.
ASSISTANT UNITED STATES ATTORNEY